

**Federal Defenders
OF NEW YORK, INC.**

Southern District
52 Duane Street-10th Floor, New York, NY 10007
Tel: (212) 417-8700 Fax: (212) 571-0392

David E. Patton
Executive Director

Southern District of New York
Jennifer L. Brown
Attorney-in-Charge

February 16, 2022

BY ECF

Honorable Sidney H. Stein
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

MEMO ENDORSED

Re: United States v. Ricardo Quiroga Guzman
19 Cr. 715 (SHS)

Dear Judge Stein,

I write to respectfully request that the Court adjourn the status conference and motions deadline, both of which are scheduled for Tuesday, February 22, 2022, for approximately 60 days. The government by Assistant United States Attorney Benjamin Schrier consents to this request.

Mr. Quiroga Guzman and undersigned counsel are still in the process of reviewing the discovery provided to date (which has been difficult given the restrictions on jail visiting that were implemented during the surge of the omicron variant). And, the parties are currently engaged in serious plea negotiations and seek an opportunity to resolve those discussions before filing any motions.

Given the nature of this request, the defense consents to the exclusion of time under the Speedy Trial Act until the newly selected date.

Thank you for your consideration.

Respectfully submitted,

/s/

Sylvie Levine
Assistant Federal Defender
212-417-8729

The conference date and the deadline to file motions are adjourned to April 15 at 10:00 a.m. The Court finds that the ends of justice served by this continuance outweigh the best interests of the public and the defendant in a speedy trial pursuant to 18 U.S.C. Sec. 3161(h)(7)(A) *and excludes time from today until April 15, 2022*
Dated: New York, New York

February 16, 2022

SO ORDERED:


Sidney H. Stein, U.S.D.J.